

**UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

MICHAEL ALLEN SPITZER)	
)	
Plaintiff,)	Case No. 1:20-CV-00330
)	
v.)	
)	JURY DEMANDED
ZOUKI FOR AMERICA CORPORATION)	
)	
Defendant.)	

DEFENDANT’S FED. R. CIV. P. P. 26(a)(3)(A)(i) FINAL WITNESS LIST

Comes now, Zouki for America Corporation (hereinafter “Zouki”), pursuant to Federal Fed. R. Civ. P. 26(a)(3)(A)(i) and makes its final witness list disclosure to Plaintiff as follows:

- A. Michael Spitzer
Plaintiff and former employee of Zouki
c/o counsel to contact
Mr. Spitzer is expected to have knowledge of his employment with Zouki, any alleged disabilities he claims to have, his work at Zouki, how his alleged disability impacted his work and treatment for any medical conditions or disabilities he allegedly suffers from.
- B. Faddy Zouki
President of Zouki
c/o counsel for Contact information
Faddy Zouki owner of Zouki would is expected to have general knowledge of Zouki, its business and business structure and general procedures/policies in place for its employees.
- C. Stacey Healy
Employee Manager for Zouki
c/o counsel for Contact information
Ms. Healy is expected to have knowledge of Mr. Spitzer’s employment with Zouki, Mr. Spitzer’s performance and work as an employee of Zouki, her interaction and communication with Mr. Spitzer during Mt. Spitzer’s employment at Zouki, and the general procedures and policies of Zouki and its employees.
- D. Shawn Torbey
Employee Manager for Zouki

c/o counsel to contact

Mr. Torbey is expected to have knowledge of Mr. Spitzer's employment with Zouki, Mr. Spitzer's performance and work as an employee of Zouki, his interaction and communication with Mr. Spitzer during Mr. Spitzer's employment at Zouki, and the general procedures and policies of Zouki and its employees.

- E. Any and all individuals and or witnesses identified by Plaintiff with regard to their knowledge of Mr. Spitzer's employment with Zouki, Mr. Spitzer's treatment while at Zouki, Mr. Spitzer's work and performance while at Zouki, Mr. Spitzer's disability and how it imputed his work at Zouki, and any and all medical doctors, physicians and/or medical and/or mental health professionals whom have treated Mr. Spitzer for his alleged disability and alleged treatment while at Zouki.

RESPECTFULLY SUBMITTED this 1st day of April, 2022.

BARHAM & MAUCERE LLC

/s/ **Steven G. Fuller**

Steven G. Fuller TN BPR #023267

Admitted to Practice in U.S. District Court

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served upon the following party via email CM/ECF electronic filing system.

Dated April 1, 2022

R. Ethan Hargraves, Esq.
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Attorney for Plaintiff

/s/ **Steven G. Fuller**

Steven G. Fuller